

**UNITED STATES COURT OF APPEALS
FOR THE DISTRICT OF COLUMBIA CIRCUIT**

LONG BEACH MEMORIAL MEDICAL CENTER
D/B/A MEMORIALCARE LONG BEACH MEDICAL
CENTER & MEMORIALCARE MILLER CHILDREN'S
AND WOMEN'S HOSPITAL LONG BEACH,

Petitioner/Cross-Respondent,

v.

NATIONAL LABOR RELATIONS BOARD,

Respondent/Cross-Petitioner

and,

CALIFORNIA NURSES ASSOCIATION/NATIONAL
NURSES UNITED

Intervenor for Respondent.

Case No. 18-1125 consolidated
with No. 18-1143

**PETITIONER'S/CROSS-RESPONDENT'S UNOPPOSED MOTION FOR
14-DAY EXTENSION OF TIME TO FILE REPLY BRIEF**

Pursuant to Federal Rule of Appellate Procedure 27 and D.C. Circuit Rules 27(h) and 28(e), Petitioner/Cross-Respondent (“Petitioner”) respectfully submits this unopposed motion for a fourteen-day extension, through and including March 11, 2019, to file a reply brief in the above-listed matter. This is Petitioner’s first request for an extension and the Respondent/Cross-Petitioner and Intervenor for Respondent consent to this request.

On February 5, 2019, Respondent/Cross-Petitioner, the National Labor Relations Board filed a Brief opposing Petitioner’s basis for review of the underlying agency determination at issue in this matter. Petitioner’s reply to the opposition brief is presently due February 25, 2019, and a due to a recent change in attorney personnel, Petitioner has substantial need for a brief extension of time to file a reply.

The attorney primarily responsible for researching and drafting a reply brief in this matter, Kathleen Paterno, is currently on an extended leave-of-absence. In Ms. Paterno's absence, attorney RyAnn McKay Hooper will assume this role. Petitioner requests a short extension of time to file a reply brief so that Ms. Hooper can get up-to-speed on the matter and previous filings.

Petitioner counsel conferred with opposing counsel in this matter and all counsel consent to the Petitioner's request. Accordingly, we request the Court grant Petitioner's request to extend the deadline to file a reply through and including March 11, 2019.

Respectfully submitted,

/s/ Adam C. Abrahms

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